



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

November 12, 2004

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

TO: Interested Parties / Applicant

RE: Weiss Prestaining, Inc / 091-18128-00069

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice.** The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-MOD.dot 9/16/03



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November 12, 2004

Mr. Greg Weiss
Weiss Prestaining, Inc.
P.O. Box 650
North Liberty, IN 46554

Re: **091-18128**
Minor Source Modification to:
Part 70 Operating Permit No.: **T 091-7626-00069**

Dear Mr. Weiss:

Weiss Prestaining, Inc. was issued Part 70 Operating Permit **T 091-7626-00069** on September 28, 1998 for a stationary exterior wood siding surface coating operation. An application to modify the source was received on October 28, 2003. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (d) One (1) wood fired heater, identified as WS-01, exhausting through Stack WSS-01, capacity: 0.05 tons of wood per hour.

The following has been added as an insignificant activity:

- (b) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

One (1) natural gas fired boiler, identified as GB-01, exhausting to stack GBS-01, rated at: 0.60 million British thermal units per hour. [326 IAC 6-2-4]

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.
6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction and operation when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 Operating Permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter contact Craig J. Friederich, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395, ext. 19 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original Signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
CJF/MES

cc: File - LaPorte County
LaPorte County Health Department
Northwest Regional Office
Air Compliance Section Inspector - Rick Massoels
Compliance Branch - Karen Ampil
Administrative and Development
Technical Support and Modeling - Michele Boner



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

**Weiss Prestaining, Inc.
3522 South SR 104
LaPorte, Indiana 46350**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) 40 CFR Part 70.6, IC 13-15 and IC 13-17.

First Minor Source Modification No.: 091-18128-00069	Conditions Affected: A.2, A.3, D.2.2 Sections Affected: D.2, D.3
Issued by: Original Signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: November 12, 2004

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary exterior wood siding surface coating operation.

Responsible Official: Greg Weiss
Source Address: 3522 South SR 104, LaPorte, IN 46350
Mailing Address: P.O. Box 650, North Liberty, IN 46554
SIC Code: 2499
County Location: LaPorte
County Status: Moderate Nonattainment for 8-hour Ozone
Attainment for all other criteria pollutants
Source Status: Major Source, under PSD Rules and Nonattainment NSR
Part 70 Permit Program

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Four (4) flowcoating machines, identified as Units 1, 2, 3, and 4A, coating wood boards and panels with a combined capacity of 5,833.34 square feet per hour, with Unit 2 exhausting through Stack ID# V-1. One (1) dry room and one (1) dry area with four (4) general ventilation fans, identified as GV-1, GV-2, GV-3, and GV-4, are used to dry the boards. One (1) dip coat bucket, used to coat nails with a capacity of 3.88 pounds per hour, is exhausted to general ventilation.
- (b) One (1) latex/oil based flow coater, known as Machine #5, exhausted to general ventilation fans 1,2,3 and 4, capacity: 7,500 square feet of wood siding panels or boards per hour on latex or 7,000 square feet of wood siding panels or boards per hour on oil.
- (c) One (1) oil based/latex flow coater, known as Machine #6, exhausted to Stack V-1 and to general ventilation fans 1,2, 3 and 4, capacity: 7,000 square feet of wood siding panels or boards per hour on oil or 7,500 square feet of wood siding panels or boards per hour on latex.
- (d) One (1) wood fired heater, identified as WS-01, exhausting through Stack WSS-01, capacity: 0.05 tons of wood per hour.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities, which are specifically regulated, as defined in 326 IAC 2-7-1(21).

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.

- (b) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

One (1) natural gas fired boiler, identified as GB-01, exhausting to stack GBS-01, rated at: 0.60 million British thermal units per hour. [326 IAC 6-2-4]

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, Billing, Licensing, and Training Section), to determine the appropriate permit fee.

B.27 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

The following insignificant activities:

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

One (1) natural gas fired boiler, identified as GB-01, exhausting to stack GBS-01, rated at: 0.60 million British thermal units per hour. [326 IAC 6-2-4]

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the PM from the insignificant welding equipment shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.2 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (Particulate Emissions Limitations for Facilities Constructed after September 21, 1983) the allowable PM emissions from the one (1) natural gas fired boiler, identified as GB-01, shall not exceed 0.6 pound per million British thermal units heat input.

Compliance Determination Requirements

D.2.3 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.3

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (b) One (1) latex/oil based flow coater, known as Machine #5, exhausted to general ventilation fans 1, 2, 3 and 4, capacity: 7,500 square feet of wood siding panels or boards per hour on latex or 7,000 square feet of wood siding panels or boards per hour on oil.
- (c) One (1) oil based/latex flow coater, known as Machine #6, exhausted to Stack V-1 and to general ventilation fans 1, 2, 3 and 4, capacity: 7,000 square feet of wood siding panels or boards per hour on oil or 7,500 square feet of wood siding panels or boards per hour on latex.
- (d) One (1) wood fired heater, identified as WS-01, exhausting through Stack WSS-01, capacity: 0.05 tons of wood per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

- (a) Pursuant to CP 091-9572-00069, issued on December 1, 1998, the input of volatile organic compounds to Machines 5 and 6 shall be limited to less than 250 tons, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 250 per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable. During the first 12 months of operation, VOC usage shall be limited such that the total VOC used divided by the accumulated months of operation shall not exceed the limit specified.
- (b) Any change or modification which may increase potential emissions to 250 tons per year from Machines 5 and 6 shall require approval from IDEM, OAM prior to making the change.

D.3.2 Volatile Organic Compounds and VHAPs [326 IAC 8-1-6] [326 IAC 2-1-3.4]

Pursuant to CP 091-9572-00069, issued on December 1, 1998, BACT was determined to be:

- (a) The as-installed flow coating machines with a high transfer efficiency.
- (b) A VOC emission limit of 249 tons per twelve (12) consecutive month period.
- (c) A maximum VOC coating content not to exceed 5.98 pounds per gallon less water on a weekly volume weighted average basis.
- (d) All stains and latex coatings shall not exceed a maximum VHAP content of (1.0) pound VHAP per pound solid, as applied.
- (e) The preparation and maintenance of a written work practice implementation plan within sixty (60) calendar days after permit issuance. The work practice implementation plan must define environmentally desirable work practices for each wood coating manufacturing operation and at a minimum address each of the following work practice standards:

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for Part 70 Minor Source and Minor Permit Modifications

Source Background and Description

Source Name:	Weiss Prestaining, Inc.
Source Location:	3522 South SR 104, LaPorte, Indiana 46350
County:	LaPorte
SIC Code:	2499
Operation Permit No.:	T 091-7626-00069
Operation Permit Issuance Date:	September 28, 1998
Minor Source Modification No.:	091-18128-00069
Minor Permit Modification No.:	091-18333-00069
Permit Reviewer:	Craig J. Friederich

The Office of Air Quality (OAQ) has reviewed a modification application from Weiss Prestaining, Inc. relating to the construction and operation of the following emission units and pollution control devices:

- (a) One (1) wood fired heater, identified as WS-01, exhausting through Stack WSS-01, capacity: 0.05 tons of wood per hour.
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:

One (1) natural gas fired boiler, identified as GB-01, exhausting to stack GBS-01, rated at: 0.60 million British thermal units per hour.

History

On October 28, 2003, Weiss Prestaining, Inc. submitted an application to the OAQ requesting to add a wood fired heater and a natural gas fired boiler, each used to heat the building, to their existing plant. Weiss Prestaining, Inc. was issued a Part 70 permit on September 28, 1998.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

The new units are not part of the process, therefore, no stack information has been provided.

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on October 28, 2003.

Emission Calculations

See pages 1 through 4 of 4 of Appendix A of this document for detailed emissions calculations.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA.”

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential To Emit (tons/year)
PM	6.70
PM ₁₀	6.72
SO ₂	0.090
VOC	3.38
CO	50.7
NO _x	0.876

HAPs	Potential To Emit (tons/year)
Benzene	0.424
Toluene	0.160
MEK	0.063
Xylene	0.044
Naphthalene	0.063
All Other HAPs	Negligible
TOTAL	Single less than 10, combined less than 25

Justification for Modification

The Part 70 Operating Permit is being modified through a Part 70 Minor Source Modification. This modification is being performed pursuant to 326 IAC 2-7-10.5(d)(3)(D), because the potential to emit

CO is greater than twenty-five (25) tons per year, but less than one-hundred (100) tons per year. The proposed operating conditions shall be incorporated into the Part 70 Operating Permit as a Minor Permit Modification (MPM 091-18333-00069) in accordance with 326 IAC 2-7-12(b)(1). The Minor Permit Modification will give the source approval to operate the proposed emission unit.

County Attainment Status

The source is located in LaPorte County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
1-Hour Ozone	attainment
8-Hour Ozone	moderate nonattainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and nitrogen oxides (NO_x) are regulated under the Clean Air Act (CAA) for the purposes of attaining and maintaining the National Ambient Air Quality Standards (NAAQS) for ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. LaPorte County has been designated as nonattainment for the 8-hour ozone standard. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for nonattainment new source review.
- (b) LaPorte County has been classified as attainment or unclassifiable in Indiana for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	0.273
PM ₁₀	0.273
SO ₂	0.013
VOC	449
CO	0.479
NO _x	2.27

- (a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the Technical Support Document for CP 091-9572-00069.

Potential to Emit of Modification After Issuance

Pollutant	PM (tons/yr)	PM ₁₀ (tons/yr)	SO ₂ (tons/yr)	VOC (tons/yr)	CO (tons/yr)	NO _x (tons/yr)
Proposed Modification	6.70	6.72	0.090	3.38	50.7	0.876
PSD Significant Level	25	15	40	40	100	40

This modification to an existing major stationary source is not major because the emissions increase is less than the PSD significant levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability

- (a) This significant permit modification does not involve a pollutant-specific emissions unit as defined in 40 CFR 64.1 with the potential to emit before controls equal to or greater than the major source threshold for all criteria pollutants.

Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this modification.

- (b) The one (1) natural gas fired boiler, rated at 0.6 million British thermal units per hour, deemed an insignificant activity, is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.40c, Subpart Dc-Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units), because this boiler is rated at less than ten (10) million British thermal units per hour.
- (c) The one (1) wood fired heater is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.530, Subpart AAA- New Residential Wood Heaters), because this heater meets the definition of a furnace as defined in this subpart. The heater is a solid fuel burning appliance located outside of ordinary living areas and that warms spaces other than the space where the appliance is located by the distribution of air heated in the appliance through ducts. The U.S. EPA, in a letter dated September 2, 2004, has provided an exemption of the testing and listing requirements under the American or Canadian safety testing codes, and has stated that the one (1) wood fired heater meets the definition of a furnace pursuant to 40 CFR 60.531.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs) (326 IAC 14, 326 IAC 20, 40 CFR 61 and 40 CFR Part 63) applicable to this proposed modification. The requirements of 40 CFR Part 63 Subpart DDDD-Plywood and Composite Wood Products are not applicable to this source because the source belongs to an SIC code which is not listed in this subpart, and the source does not manufacture plywood or composite wood products. Weiss Prestaining is a wood siding surface coating source.

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The potential to emit from this modification is less than the PSD significant levels. Therefore, this is a minor PSD modification to an existing major PSD source.

326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating)

The one (1) natural gas fired boiler, identified as GB-01, rated at 0.60 million British thermal units per hour, must comply with the requirements of 326 IAC 6-2-4.

The total heat input capacity for the source, including the 0.60 million British thermal units per hour boiler, is 0.60 million British thermal units per hour.

$$Pt = 1.09 / (0.60)^{0.26} = 1.25 \text{ lb/mmBtu heat input}$$

Pursuant to 326 IAC 6-2-4(a), the allowable PM emissions from a boiler with a capacity of less than ten (10) million British thermal units per hour, shall not exceed 0.6 lb/mmBtu heat input.

Based on page 2 of Appendix A, the potential PM emission rate is:

$$0.02 \text{ ton/yr} \times (2000 \text{ lbs/ton} / 8760 \text{ hrs/yr}) = 0.005 \text{ lb/hr}$$
$$(0.005 \text{ lb/hr} / 0.60 \text{ mmBtu/hr}) = 0.008 \text{ lb PM per mmBtu}$$

Therefore, the one (1) boiler identified as GB-01, will comply with this rule.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

There are no applicable compliance monitoring requirements to either of the facilities being constructed at this source.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]
[326 IAC 2-7-5(15)]

- (d) **One (1) wood fired heater, identified as WS-01, exhausting through Stack WSS-01, capacity: 0.05 tons of wood per hour.**

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- b) One (1) latex/oil based flow coater, known as Machine #5, exhausted to general ventilation fans 1, 2, 3 and 4, capacity: 7,500 square feet of wood siding panels or boards per hour on latex or 7,000 square feet of wood siding panels or boards per hour on oil.
- (c) One (1) oil based/latex flow coater, known as Machine #6, exhausted to Stack V-1 and to general ventilation fans 1, 2, 3 and 4, capacity: 7,000 square feet of wood siding panels or boards per hour on oil or 7,500 square feet of wood siding panels or boards per hour on latex.
- (d) **One (1) wood fired heater, identified as WS-01, exhausting through Stack WSS-01, capacity: 0.05 tons of wood per hour.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

- (b) **Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:**

One (1) natural gas fired boiler, identified as GB-01, exhausting to stack GBS-01, rated at: 0.60 million British thermal units per hour. [326 IAC 6-2-4]

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

The following insignificant activities:

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (b) **Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour:**
- One (1) natural gas fired boiler, identified as GB-01, exhausting to stack GBS-01, rated at: 0.60 million British thermal units per hour. [326 IAC 6-2-4]**

D.2.2 Particulate [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4(a) (Particulate Emissions Limitations for Facilities Constructed after September 21, 1983) the allowable PM emissions from the one (1) natural gas fired

boiler, identified as GB-01, shall not exceed 0.6 pound per million British thermal units heat input.

Compliance Determination Requirements

D.2.23 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

The Source Status should have been changed in the First Significant Permit Modification No.: 091-11522-00069, issued on March 30, 2000, to reflect that this is a major source under PSD rules. LaPorte County has also been re-designated as Moderate Nonattainment for 8-hour Ozone. Therefore, the source status has been changed as follows:

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary exterior wood siding surface coating operation.

Responsible Official:	Greg Weiss
Source Address:	3522 South SR 104, LaPorte, IN 46350
Mailing Address:	P.O. Box 650, North Liberty, IN 46554
SIC Code:	2499
County Location:	LaPorte
County Status:	Attainment for all criteria pollutants Moderate Nonattainment for 8-hour Ozone Attainment for all other criteria pollutants
Source Status:	Minor Major Source, under PSD Rules and Nonattainment NSR Part 70 Permit Program

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 **4230** (ask for OAQ, ~~Technical Support and Modeling~~ **Billing, Licensing, and Training** Section), to determine the appropriate permit fee.

~~B.27 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]~~

~~Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non-compliance.~~

B.27 Credible Evidence [326 IAC 2-7-5(3)][326 IAC 2-7-6][62 FR 8314]

Notwithstanding the conditions of this permit that state specific methods that may be used to demonstrate compliance with, or a violation of, applicable requirements, any person (including the Permittee) may also use other credible evidence to demonstrate compliance with, or a violation of, any term or condition of this permit.

Conclusion

The construction and operation of this proposed modification shall be subject to the conditions of the attached Part 70 Minor Source Modification No. 091-18128-00069 and Minor Permit Modification No. 091-18333-00069.

**Appendix A: Emissions Calculations
External Combustion Boiler
Wood Waste Combustion (uncontrolled)
Bark/Bark and Wet Wood**

Page 2 of 4 TSD App A

**Company Name: Weiss Prestaining, Inc.
Address City IN Zip: 3522 South SR 104, LaPorte, IN 46350
MSM: 091-18128
Plt ID: 091-00069
Reviewer: Craig J. Friederich
Date: October 28, 2003**

Wood Fired Heater

Capacity (MMBtu/hr)	
Capacity (tons/hr)	0.05
Higher Heating Value of Fuel (Btu/lb)	
Converted Capacity in MMBtu/hr	0

	Pollutant					
	Benzene	Toluene	MEK	Xylene	Naphthalene	CO**
Emission Factor in lb/ton	1.938	0.73	0.29	0.202	0.288	230.8
Potential Emissions in tons/yr	0.424422	0.15987	0.06351	0.044238	0.063072	50.5452

Methodology

To convert from tons/hr capacity to MMBtu/hr capacity:

Heat Input Capacity (MMBtu/hr) = Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/106 Btu/) x 2000 lbs/1 ton

Emission Factors are from AP-42
Chapter 1.10 for residential wood
stoves

Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1ton/2000lbs

Appendix A: Emissions Calculations
External Combustion Boiler
Wood Waste Combustion (uncontrolled)
Dry Wood

Page 1 of ? TSD App A

Company Name:
Address City IN Zip:
CP:
Pit ID:
Reviewer:
Date:

Capacity (MMBtu/hr)
OR, if you don't have the capacity in MMBtu/hr but have in in tons of wood waste burned per hour:
 Capacity (tons/hr)
 Higher Heating Value of Fuel (Btu/lb)
 Converted Capacity in MMBtu/hr 0 copy this value into the Capacity (MMBtu/hr) cell

Emission Factor in lb/MMBtu	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO**
	0.4	0.377	0.327	0.025	0.49	0.013	0.6
Potential Emissions in tons/yr	0	0	0	0	0	0	0

Wet wood is considered to be greater than or equal to 20% moisture content. Dry wood is considered to be less than 20% moisture content.

*The PM10 and PM2.5 emission factors include the condensible PM emission factor of 0.017 lb/MMBtu, measured by EPA Method 202 (or equivalent) and the appropriate filterable PM emission factor, measured by EPA Method 5 (or equivalent). The PM emission factor is filterable PM measured by EPA Method 5 (or equivalent).

**The CO emission factor is for stokers and dutch ovens/fuel cells. Change the emission factor to 0.17 lb/MMBtu if the calculations are for a fluidized bed combustor.

Methodology

To convert from tons/hr capacity to MMBtu/hr capacity:

Heat Input Capacity (MMBtu/hr) = Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/106 Btu/) x 2000 lbs/1 ton

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry wood-fired boilers

Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1ton/2000lbs

woodwaste.xls (created 9/01, revised 3/02 RLM)

Appendix A: Emissions Calculations
External Combustion Boiler
Wood Waste Combustion (uncontrolled)
Wet Wood

Page 1 of ? TSD App A

Company Name:
Address City IN Zip:
CP:
Plt ID:
Reviewer:
Date:

Capacity (MMBtu/hr)
OR, if you don't have the capacity in MMBtu/hr but have in in tons of wood waste burned per hour:
 Capacity (tons/hr)
 Higher Heating Value of Fuel (Btu/lb)
 Converted Capacity in MMBtu/hr 0 copy this value into the Capacity (MMBtu/hr) cell

	Pollutant						
	PM*	PM10*	PM2.5*	SO2	NOx	VOC	CO**
Emission Factor in lb/MMBtu	0.33	0.307	0.267	0.025	0.22	0.013	0.6
Potential Emissions in tons/yr	0	0	0	0	0	0	0

Wet wood is considered to be greater than or equal to 20% moisture content. Dry wood is considered to be less than 20% moisture content.
 *The PM10 and PM2.5 emission factors include the condensible PM emission factor of 0.017 lb/MMBtu, measured by EPA Method 202 (or equivalent) and the appropriate filterable PM emission factor, measured by EPA Method 5 (or equivalent). The PM emission factor is filterable PM measured by EPA Method 5 (or equivalent).
 **The CO emission factor is for stokers and dutch ovens/fuel cells. Change the emission factor to 0.17 lb/MMBtu if the calculations are for a fluidized bed combustor.

Methodology

To convert from tons/hr capacity to MMBtu/hr capacity:
 Heat Input Capacity (MMBtu/hr) = Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/106 Btu) x 2000 lbs/1 ton

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry wood-fired boilers

Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1ton/2000lbs

woodwaste.xls (created 9/01, revised 3/02 RLM)

**Appendix A: HAPs Emissions Calculations
External Combustion Boiler
Wood Waste Combustion (uncontrolled)
All Wood Waste Fuel Types**

Page 1 of ? TSD App A

Company Name:
Address City IN Zip:
CP:
Plt ID:
Reviewer:
Date:

Capacity (MMBtu/hr)
OR, if you don't have the capacity in MMBtu/hr but have in in tons of wood waste burned per hour:
 Capacity (tons/hr)
 Higher Heating Value of Fuel (Btu/lb)
 Converted Capacity in MMBtu/hr 0 copy this value into the Capacity (MMBtu/hr) cell

	Selected Hazardous Air Pollutants				
	Acrolein	Benzene	Formaldehyde	Hydrogen Chloride	Styrene
Emission Factor in lb/MMBtu	4.0E-03	4.2E-03	4.4E-03	1.9E-02	1.9E-03
Potential Emissions in tons/yr	0.0E+00	0.0E+00	0.0E+00	0.0E+00	0.0E+00

Methodology

To convert from tons/hr capacity to MMBtu/hr capacity:

Heat Input Capacity (MMBtu/hr) = Capacity (tons/hr) x Higher Heating Value of wood fuel (Btu/lb) x (1 MMBtu/106 Btu/) x 2000 lbs/1 ton

Emission Factors are from AP-42 Chapter 1.6 (revised 3/02), SCCs #1-0X-009-YY where X = 1 for utilities, 2 for industrial, and 3 for commercial/institutional; Y = 01 for bark-fired boilers, 02 for bark and wet wood-fired boilers, 03 for wet wood-fired boilers, and 08 for dry wood-fired boilers

Emissions (tons/yr) = Capacity (MMBtu/hr) x Emission Factor (lb/MMBtu) x 8760hrs/yr x 1ton/2000lbs

These factors include the five HAPs with the highest AP-42 emission factors.

**Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler**

Page 3 of 4 TSD App A

Company Name: Weiss Prestaining, Inc.
Address City IN Zip: 3522 South SR 104, LaPorte, IN 46350
MSM: 091-18128
Pit ID: 091-00069
Reviewer: Craig J. Friederich
Date: October 28, 2003

Gas Fired Boiler

Heat Input Capacity
MMBtu/hr

Potential Throughput
MMCF/yr

0.60

5

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.005	0.020	0.002	0.263	0.014	0.2

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 4 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Page 4 of 4 TSD App A

Company Name: Weiss Prestaining, Inc.
Address City IN Zip: 3522 South SR 104, LaPorte, IN 46350
MSM: 091-18128
Pit ID: 091-00069
Reviewer: Craig J. Friederich
Date: October 28, 2003

	HAPs - Organics				
Emission Factor in lb/MMcf	Benzene 0.002	Dichlorobenzene 0.001	Formaldehyde 0.075	Hexane 1.80	Toluene 0.003
Potential Emission in tons/yr	0.0000	0.0000	0.000	0.005	0.0000

	HAPs - Metals					
Emission Factor in lb/MMcf	Lead 0.001	Cadmium 0.001	Chromium 0.001	Manganese 0.0004	Nickel 0.002	Total
Potential Emission in tons/yr	0.0000	0.0000	0.0000	0.00000	0.0000	0.005

Methodology is the same as page 3.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.